

CLERK OF COURT
JULY 10, 2006
OFFICE OF MASS.
**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JANICE STEVENSON,
Plaintiff,

2006 JUN 26 P 5:03

v.

**NEIGHBORHOOD HOUSE CHARTER
SCHOOL,**
Defendant.

FILED
CLERK'S OFFICE

CIVIL ACTION NO. 05-CV-11584-DPW

**REQUEST NO. I FOR PRODUCTION OF DOCUMENTS
DIRECTED TO DEFENDANT**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff requests that Defendant produce and deliver within (30) days, the documents herein described to the address below..

This request is intended to cover all documents in possession of the Defendant, or subject to his custody and control, regardless of location.

As used in this request, the term "document" means every writing or record of every type and description that is in the possession, control or custody of Defendant, including but without limitation to, correspondence, memoranda, stenographic or handwritten notes, studies, publications, books, pamphlets, pictures, films, voice recordings, reports, surveys; minutes or statistical compilations, data processing cards or computer records, files, disks, or tapes or print-outs; agreements, communications, state and federal governmental hearings, and reports, correspondence, telegrams, memoranda, summaries or records of telephone conversations, summaries or records of personal conversations or interviews, diaries, graphs, reports, notebooks, note charts, plans, drawings, sketches, maps, summaries or records of meetings or conferences, summaries or reports of investigations or negotiations, opinions or reports of consultants, photographs, motion picture film, brochures, pamphlets, advertisements, circulars, press releases, drafts, letters, any marginal comments appearing on any document, and all other writings.¹

¹ The term "correspondence" is to be construed throughout the request for production in its broadest sense and includes but is not limited to letters, emails, telegrams, notices, messages, or other written communications or memoranda or other records of conversations, meetings, conferences, or other communications.

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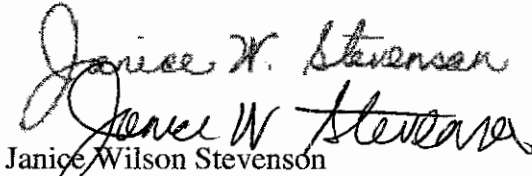
REQUESTS FOR PRODUCTION

Please produce the following:

1. All emails and documents relating to termination of Plaintiff.
2. All documents relating to Defendant's fraud reporting policies.
3. All form letters, enclosures, envelopes, memoranda, etc. used by the Defendant in its investigation of Plaintiff's complaint.
4. All material, including video and audio tapes, pertaining to training by or for the Defendant and its employees regarding suspicious fraudulent financial activity reporting.
5. An organizational chart for the Defendant.
6. All documents, including emails and phone calls between Jagdish Chokshi, Defendant, and Lynn Clark from November 2004 to present.
7. All documents including emails and phone calls between Jagdish Chokshi, Defendant, and Genevieve Davis November 2004 to present.
8. Copies of any litigation filed against the Defendant by former employees since July 30, 2002,
9. A list of all employees terminated including their positions and responsibilities.
10. Any insurance policies covering the Defendant for employee theft and/or business malpractice.
11. All financial reports and statements for charges made against all ATM/credit cards for the School and/or its foundation for 2005 and 2006.
12. A list of all FT and PT employees, independent contractors, and 1099 employees employed in HR, Operations and Finance Manager, A/P, A/R, and Public Funding since July 2004.
13. Job descriptions and wage record for intern Lynn Clark.
14. All documents in the Defendant's possession sent to or received from the Lynn Clark.
15. All emails sent to or received from Lynn Clark from Jagdish Chokshi.
16. All internal documents, memoranda, etc., of the Defendant regarding its petty cash accounting, disbursements and procedures.
17. All documents, memoranda, instructions, manuals, etc. of the Defendant surveying the number of notices sent and contacts made by the Defendant in the year preceding the date of the notice sent to Plaintiff.
18. Proof Defendant provided participants with written summaries of their rights, benefits, and responsibilities under it plan.
19. All operation manuals or similar documents, etc., utilized by the Defendant.
20. All documents relating to the maintenance of procedures by the Defendant adapted to avoid any fraudulent financial activity
21. All documents relating to the Defendant's accounting procedures to provide verification of internal compliance.
22. Petty cash recons since November 2004 to present.
23. Copies of all summary plan descriptions for all benefits and pension plans.
24. Copies of all reports and documents utilized by an expert which Defendant proposes to call at trial.
25. All exhibits which Defendant proposes to introduce at trial. This Request shall be

deemed continuing so as to require further and supplemental production if Plaintiffs obtain additional documents required to be produced herein between the time of the initial production and the time of trial.

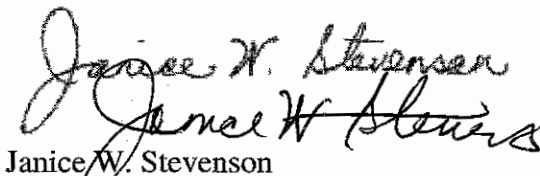
Date: June 22, 2006

A handwritten signature in cursive script, reading "Janice W. Stevenson".

Janice Wilson Stevenson
P.O. Box 400372
Cambridge, MA 02140
617-721-2638 - cell
201-622-4890 - fax

CERTIFICATE OF SERVICE

I hereby certify that this document was filed and that a true copy of the above document was served on Barry Miller, BMiller@seyfarth.com, and Lynn Kappelman, LKappelman@seyfarth.com, by electronic mail on June 22, 2006.

A handwritten signature in cursive script, reading "Janice W. Stevenson".

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janicestevensonus@gmail.com

U.S. COURT
DISTRICT OF MASS.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

**JANICE STEVENSON,
Plaintiff,**

2006 JUN 26 P 5:03

v.

**NEIGHBORHOOD HOUSE CHARTER
SCHOOL,
Defendant.**

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CIVIL OFFICE

CIVIL ACTION NO. 05-CV-11584-DPW

**REQUEST NO. II FOR PRODUCTION OF DOCUMENTS
DIRECTED TO DEFENDANT**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff requests that Defendant produce and deliver within (30) days, the documents herein described to the address below..

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REQUESTS FOR PRODUCTION

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Please produce the following:

- 1) **2005 NHCS Dental Plan;**
- 2) **NHCS Dental Plan (Amended 2005 plan documents, which were effective 12/18/2004);**
- 3) **2005 NHCS Health Plan;**
- 4) **NHCS Health Plan (Amended 2005 plan documents, which were effective 12/18/2004);**
- 5) **2005 NHCS Life Insurance Plan;**
- 6) **NHCS Life Insurance Plan (Amended 2005 plan documents, which were effective 12/18/2004);**
- 7) **2005 NHCS Retirement Plan;**
- 8) **NHCS Retirement Plan (Amended 2005 plan documents which were effective 1/1/200~~5~~₄);**
- 9) **2006 NHCS Dental Plan;**
- 10) **NHCS Dental Plan (Amended 2006 plan documents, which were effective 12/18/2005);**
- 11) **2006 NHCS Health Plan;**
- 12) **NHCS Health Plan (Amended 2006 plan documents, which were effective 12/18/2005);**
- 13) **2006 NHCS Life Insurance Plan;**
- 14) **NHCS Life Insurance Plan (Amended 2006 plan documents, which were effective 12/18/2005);**
- 15) **2006 NHCS Retirement Plan;**
- 16) **NHCS Retirement Plan (Amended 2006 plan documents which were effective 1/1/2005);**
- 17) **Name, address, and contact information of the Plan Administrator(s) for the above benefit(s)**

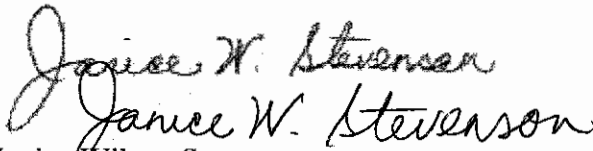
18) 2003 thru 2006 Form 5500 and all attachments, amendments, correspondence to Department of Labor and from Department of Labor regarding specified years

NOTE: In addition, please send me any/all copies of amendments or modifications which have been made to any one of the above requested plans.

Please consider this request for the formal plan documents (not JUST the "Summary Plan Documents (SPD)" for each) for all plans, as I have not received copy of any of these full plans

Please note that this is not just a request for the Summary Plan Documents (SPDs) for these plans, but a request for the official plan documents, i.e., any trust agreement, contract or other instruments under which these plans are established and operated ---> the Documents and instruments under which these plans are established or operated, including, for example, the plan document, Schedule B, trust agreement, SPD, SMM, and latest annual report, etc.

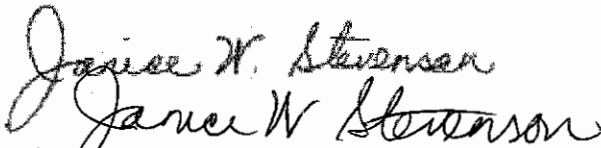
Date: June 22, 2006



Janice Wilson Stevenson
P.O. Box 400372
Cambridge, MA 02140
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REQUESTS FOR PRODUCTION

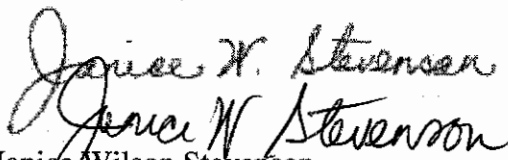
Please produce the following:

1. Any and all correspondence or other documents sent by you to Neighborhood House Charter School [NHCS] that refer to Plaintiff.
2. Any and all correspondence or other documents sent by you to Sullivan and Worcester [SandW] that refer to Plaintiff.
3. Any and all correspondence or other documents sent by you to any state or federal agency that refer to Plaintiff.
4. Any and all correspondence or other documents sent by NHCS to you that refer to Plaintiff.
5. Any and all correspondence or other documents sent by SandW to you that refer to Plaintiff.
6. Any and all correspondence or other documents sent by any state or federal agencies to you that refer to Plaintiff.
7. Any and all documents which contain or pertain to any communication or complaint that refer to Plaintiff by you to NHCS.
8. Any and all documents which contain or pertain to any communication or complaint that refer to Plaintiff by you to SandW.
9. Any and all documents which contain or pertain to any communication or complaint that refer to Plaintiff by you to any state or federal agencies.
10. Any and all documents which pertain to any meeting, conference, or discussions in which Plaintiff was discussed or referenced to either NHCS, SandW, state or federal agencies.
11. Any and all documents which pertain to the terms and/or conditions of Plaintiff's employment to NHCS.
12. Any and all documents which pertain to the terms and/or conditions of Plaintiff's employment to SandW.
13. Any and all documents which pertain to the terms and/or conditions of Plaintiff's employment to state or federal agencies.
14. Any and all documents which pertain to the cessation of Plaintiff's employments to NHCS.
15. Any and all documents which pertain to the cessation of Plaintiff's employments to NHCS.
16. Any and all documents which pertain to the cessation of Plaintiff's employments to any state or federal agencies.
17. Any and all documents which contain or pertain to any communication or complaint made by you, to any state or federal agencies regarding any topic, including, but not limited work conditions, payroll practices, foreign cultural practices, work schedules, overtime hours, NHCS' internal procedure controls, personal loan or payments to interns, manipulation of the payables side of NHCS' financial equation, compliance irregularities, presentation of tax liabilities by NHCS or any other protected activity.
18. Any and all documents which contain or pertain to any communication or complaint made by NHCS to any state or federal agencies regarding any topic, including, but not limited work conditions, payroll practices, foreign cultural practices, work

schedules, overtime hours, NHCS' internal procedure controls, personal loan or payments to interns, manipulation of the payables side of NHCS' financial equation, compliance irregularities, presentation of tax liabilities by NHCS or any other protected activity.

19. Any and all documents which contain or pertain to any communication or complaint made by SandW to any state or federal agencies regarding any topic, including, but not limited work conditions, payroll practices, foreign cultural practices, work schedules, overtime hours, NHCS' internal procedure controls, personal loan or payments to interns, manipulation of the payables side of NHCS' financial equation, compliance irregularities, presentation of tax liabilities by NHCS or any other protected activity.
20. Any and all date books, daily planners, diaries, palm pilot data, or other documents/instruments used to record your daily schedule that contain references to meetings, appointments, conferences, or discussions concerning any complaint made to state and federal agencies that refer to Plaintiff.
21. Any and all date books, daily planners, diaries, palm pilot data, or other documents/instruments used to record NHCS' daily schedule that contain references to meetings, appointments, conferences, or discussions concerning any complaint made to state and federal agencies that refer to Plaintiff.
22. Any and all date books, daily planners, diaries, palm pilot data, or other documents/instruments used to record SandW daily schedule that contain references to meetings, appointments, conferences, or discussions concerning any complaint made to state and federal agencies that refer to Plaintiff.
23. Any and all documents which contain or pertain to any communications to or from government agencies that refer to NHCS, SandW, including but not limited to correspondence with the Occupational Safety and Health Administration, Wage and Hour Division, and any correspondence with any other state or federal governmental agency.
24. Any and all documents which contain or pertain to any communication with third parties regarding this case or Plaintiff's complaint against NHCS.
25. Any and all documents related to your business relationship with SandW.

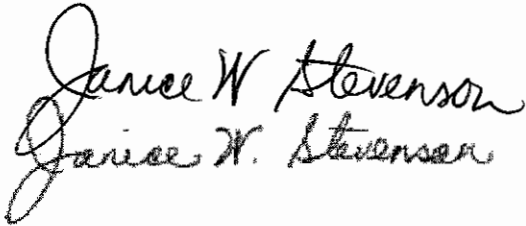
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